RESTORATION ADVISORY BOARD

FOR

NAS JRB / ARS WILLOW GROVE

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Wednesday, March 10, 2004
Willow Grove, Pennsylvania

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Meeting held in the above-captioned matter held at the Naval Air Station Joint Reserve Base, beginning at approximately 6:00 p.m., before Kimberly A. Overwise, a Registered Professional Reporter, Certified Shorthand Reporter, and Notary Public.

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LAWYER'S NOTES

PAGE	LINE	

PRESENT:

Jim Edmond
Russ Turner
Cdr. Richard Rosene
April Flipse
Maria Magilton
Ed Boyle
Katherine Sheedy
Jeff Dale
Ron Sloto
Charanjit Gill
Yuriy Neboga
John C. Martin
George R. Hoffer
Ted Roth

MR. EDMOND: Gentlemen, I just wanted to let you know that the Air Station was put in for the Commander in Chief's installation excellence award for the environment. So we could be winning an award there. The Air Station was also put in for the -- I should say was put in for the Commander in Chief's installation award for the Base itself and we were put in for the DOD shoreside environmental award. There's going to be a change in command in July. Captain Smith is leaving and Captain Meyers is coming aboard. And there's going to be a Midway celebration to celebrate the 60th anniversary of the Battle of Midway. That's the doings on the Air Station.

Some of the things we're doing environmentally on the Air Station, the Air Force and Navy are combining haz mat and haz waste operations to minimize cost and maximize the jointness of the Air Station. We're very close to auditing our EMS for the Air Station, which will

make us the only certified EMS Air Station in the Navy and one of only four Navy installations with an EMS, the only nonpilot program facility with an EMS. We've been partnering with PADEP and EPA, the Air Force and ourselves, so the state regulators and DOD talk together. It's called PEP or Pennsylvania Environmental Partnering. We're stressing our affirmative procurement trying to help generate marketing for recyclables by increasing our buying green products, so to speak. We also are about ready to kick off a biodiesel program where all our diesel vehicles on the Air Station with the exception of tactical vehicles will be using 20 percent biodiesel mixed in with diesel, so 20 percent vegetable oil more or less and 80 percent diesel fuel, to help cut our pollution but also cutting our dependence on foreign oil supplies.

That's basically what's happening on the Air Station. So I'm

going to kick it off to Mr. Ed Boyle, our remedial manager at EFANE. He'll give you an update on what we're doing this summer in the near future at Willow Grove.

Ed.

MR. BOYLE: First I'll turn it over to Maria, EA Engineering. They've done some work out at Sites 10 and 11 and some of it in conjunction with the work we're doing at Site 1, which I'll be addressing later.

MS. MAGILTON: EA just recently completed their second round of groundwater sampling here at IR Site 10, the former fuel farm, about two weeks ago from February 19 through 27. We completed the first round in the summer so this was our second round of groundwater sampling. We sampled the existing wells and new wells we had installed in the summer if you remember from the last RAB meeting.

The one thing for the second

round of sampling, we lowered the detection limits as per PADEP's requests from what we had from the first round. PADEP had originally approved our detection limits from our first round of sampling, but once they saw the groundwater results, PADEP advised us to lower our laboratory detection limits so we can better compare our analytical results with their screening criteria.

One of the problems we faced during this past second round of sampling was FedEx failed to deliver our samples on time. The one Friday that we sampled, we sent out our coolers and they didn't deliver them on time on Saturday morning. So when they got there, they got there on Monday so the temperatures for three of the locations were off. Their cutoff temperature is 60 degrees Celsius and they were approximately .5 to a degree above that for only three of the well locations. So EA went back on Friday, the following Friday, and resampled those

three wells and sent them in, hand-delivered them to the lab that day.

EA is currently waiting for the results for the second round of sampling. We haven't received them yet. We'll either get them at the end of this week or next week. Once we get them, we are going to write a petition report and hand that in to PADEP with the first round and second round results.

As for IR Site 10 for the soil issue, PADEP is going to wait to make a decision on no further investigation for soil until after they receive the second round of groundwater sampling results. They want to look at that first before they determine what to do with that.

And for IR Site 11 for the soil, PADEP just approved and they had no comments on the draft version of our final Act 2 report, which is for liability protection under Act 2 for closure for the soils of Site 11. So EA is going to submit to them a final

shortly, by the end of the week. They should have one the beginning of next week.

So that pretty much is about what I'm going to say about Site 10. That's it.

RAB MEMBER: Question. I don't know who this is for. This is one of those jobs that it would be nice to get a golden parachute and get fired. When are we going to get this finished up? Now they're lowering the limits. Why? Is it because we can now test lower?

MS. FLIPSE: No. I think it's because the limits on maybe not everything but the limits were above -- the method detection limits that the lab was giving them were higher than the limit of what would be allowed to stay in the water. So you couldn't tell looking at your answer. If it said less than 50, that's really cool, but if it can't be above 5 and all it says is less than 50, you don't really know anything.

RAB MEMBER: So somebody screwed up somewhere.

MR. NEBOGA: I do appreciate the chance for this. Actually, detection limits had been changed to detect our constituents. Everything had been done great by consultant. But laboratory needed to -- they couldn't provide us needed detection limit and we had to choose different methods for detection actually for drinking water. There was no mistakes from the consultant. It's my pleasure to work with those consultants. It's just a problem with laboratory methods they were using.

RAB MEMBER: That they were using? But you supplied them the spec.

MR. NEBOGA: We approved this method, but some constituents were a little bit higher than it was expected and the lab needed to dissolve samples, and in the same way the higher detection limit for all substances in the water.

RAB MEMBER: So we're chasing a

moving target.

MR. NEBOGA: Yes, we do.

MS. FLIPSE: If something is higher, it's too high and you add water, you dilute it.

RAB MEMBER: So if we keep changing the target, the level, we're never going to get this thing done.

MS. FLIPSE: It will probably be done with this round.

MS. SHEEDY: The standard that PADEP is comparing the data to is not changing. That's a fixed number. Now, what happened was that the methods that PADEP originally approved are the normal methods that are used for contaminated sites. Some of the samples because of some of the constituents had to be diluted in order for the lab to run them, which is not predictable ahead of time. And when you dilute a sample, the result is that you change the laboratory detection limit. You raise it. And so some of the constituents that are

critical to look at, the report detection limit was higher than what PADEP had.

RAB MEMBER: They shouldn't have been diluted.

MS. SHEEDY: But they have to be. They couldn't have been analyzed without the dilution. And that's why we had to change methods. We had to change laboratory methods to a drinking water method, which is much more sensitive. And when -- assuming the samples will have to be diluted again, the detection limit will be within PADEP's needs. And this second round of groundwater sampling had been planned. It wasn't added because of the change in detection limits. It had been planned for quite some time.

RAB MEMBER: I'm just concerned about job perpetuation here, job security.

MS. FLIPSE: We're all trying to get done.

MR. EDMOND: Thanks, Maria.

MR. BOYLE: I think you'll be pleased to hear some of the things I'm going to be discussing.

RAB MEMBER: Your final meeting?

MR. BOYLE: No, not yet, but we're getting there. After the last meeting after I met April and Lisa and discussed -- because we hadn't had a chance to have a meeting, I discussed with them I was going to send them basically an outline where we, the Navy, thought we were and where we were going to go. And that included, you know, where I thought we were and were we in a position for an IR, our interpretation where we were. I sent that to April and Lisa from EPA, and they both basically agreed with the Navy's position where we were with these sites. So that enabled me to proceed with the scope of work to Tetra Tech to basically hopefully close or move for closure for a couple sites. And those sites are the Site 1, the

Privet Road compound, Site 2, the antenna field landfill, and Site 5, the fire training area.

RAB MEMBER: That's the whole Horsham Road line.

MR. BOYLE: Right. Site 1, Privet Road compound, I'll just give people a little bit of a background. We completed a final RI report in July of 2002 for soil and groundwater. The final RI concluded the site was not a source of contamination for Site 1 groundwater or nearby production well, but we didn't conclude that there wasn't other additional on-site sources. And that's what Maria's doing at Site 10. She's performing groundwater sampling to make sure there were no other sites on Base. We think this may be from an off-site source. So to address these issues, I tasked Tetra Tech to prepare an addendum, final RI report which will incorporate some of the data gaps that have been pointed out, and that was the Site 10

data, into a final RI and then prepare a no further action ROD for groundwater.

Also, what Jim had done previously, Jim Colter, he had started the beginning of a no further action decision or ROD for soil. That was done in a rough draft form. And we're going to also give that to Tetra Tech to finalize that report because the RI report will also recommend no further action for soil for Site 1.

Site 2, the antenna field landfill, we completed an internal version of the RI in 2002 also. And EPA identified in an EPIC study some anomalies in the soil. An EPIC study is basically they go over the area with photographs and they identify areas in the soil. And they identified some areas we missed in some of our sampling. So the Navy, Jeff mainly, went out and performed a site investigation in those areas, and he found some drums. That was last summer. We quickly tasked our EMAC

contractor to go out and remove these drums and take confirmation samples so we can see where we were at. We did that. We finalized that in August 2002. There were no issues. The drums were empty. And based on that information, I tasked Tetra Tech to finalize the RI and tabulate the information that was compiled by the EMAC contractor to complete the RI report and to prepare a no further action for soil and for groundwater for Site 2.

The last site is the fire training area. The RI for Site 5 was submitted to regulators and the RAB in 2002. The RI identified petroleum hydrocarbons in soil as a potential contaminant of concern for ecological and human health. There were very low levels but they were just elevated risks. A draft FS for groundwater at Site 5 was submitted to regulators and the RAB in 2002 also. And the FS proposed a pump and treat. The RAB suggested to the Navy

that maybe they should look for alternative methods, possibly bioremediation or I think it was chemical oxidation I think they suggested or some kind of in situ treatment rather than a pump and treat, which lasts we all know forever. So based on this background information -- and a lot of technology has changed since we really completed that FS. Technologies with chemical oxidation seem to be pretty promising technology now to address, you know, deep water contamination. So based on that, I tasked Tetra Tech to perform a revised FS report and consider two additional technologies, chemical oxidation and bioaugmentation.

Now, I don't know whether, Jeff, can you give them a little bit of background on chemical oxidation? Maybe Russ could.

MR. DALE: I could try to give a short, brief one. At Site 5, we have some compounds in the groundwater from

the past activities that aren't all that good for you and they don't break down naturally over time at any great rate. So one thing you can do is add another chemical that will destroy that or you can add some bacteria and some food that would let the bacteria eat them and naturally destroy it, almost like rotting. You can call it like that. And there's complexities with each one. One you're pumping a lot of other chemicals in the ground that might not be all that good for you and the other you have to make sure you put in the right bacteria and the right amount of food to break it down to nonhazardous substances. And both of those fields have advanced in the three or four years since we completed the initial study. And we think we have enough information to evaluate both of those, which would hopefully clean it up much quicker and much cheaper than our earlier remedy. So we're actually at this site benefiting from the fact that

it's taken a little longer to finalize our decision.

MR. BOYLE: Thanks. That was great. Also, to prepare a proposed plan and ROD for groundwater and then prepare a work plan to address the pH issue in the soils, there's been a lot of work done out in this area, I understand. I mean, I'm not that familiar with the site, but there was a fence there. There was a lot of disturbance in the soil. And we want to get a better look. The soil was very -- just elevated before and, you know, our opinion is there may not be an issue out there and we should probably go out and take another round of samples.

So I tasked Tetra Tech to perform a work plan sample for petroleum hydrocarbons and then prepare an addendum to the RI report for soils and then develop a proposed plan and ROD for soils. A lot of these things were done in assumption that we're not going to

have an issue. And I did that because I want to lock funding up. This year seems to be a little sketchy on where we're going to be later on and I'm trying to move ahead and trying to get this money locked up so we can move ahead on these sites and try to close them out or at least know where we're at. So I think that's it if anybody has any questions.

MR. EDMOND: What Ed's trying to do is if he gets all this information ready to go, ready to contract to the contractor, even if we have no money, when it gets toward the end of the year, it's like all of a sudden the trees sprout fruit and it's money fruit. And if you're ready to go, you're the one who gets the money.

MR. BOYLE: Right.

MR. EDMOND: So what we're hoping for, Ed's got all his ducks in a row, the contractor's got everything, and when somebody else can't execute their contract or they were a little slow, Ed's

going to take their money, put it to Willow Grove, and we'll start these projects.

MR. BOYLE: That typically is what happens. Someone for whatever reason, not only because someone doesn't do their job, a lot of times it's just things don't get executed because of review times or whatever, but there's a lot of issues or somebody's overoptimistic. If you get in the queue early, and that's what I plan on doing rather than doing a couple different scopes of work, get it all locked up, the funding, and we can get started as quickly as possible and try to close out some sites and get some remedial action at Site 5.

You know, the schedule is about a year and a half to accomplish all these items. Maybe the next RAB we'll have a better idea on the schedule. Because it isn't funded yet, I don't want to give any kind of schedule. But when I have a

better idea of schedule, I'll give that to the RAB.

RAB MEMBER: In other words, you're trying to tell us there's no agenda for wrapping that thing up; right?

MR. BOYLE: No. All these items are to wrap things up, to close sites out. That's my goal. I was looking at a lot of these sites and there's a lot of work that's been done here. And we're in a position to close a lot of these sites out, but we haven't done it. So, you know, looking at the items, I thought let me make sure that coming in as new project manager make sure if I'm scoping our contractor to close a site out, I want to make sure the regulators are agreeing with me, that they don't think there's an issue or if we do this and this and everything comes out the way we think it may that we can move ahead with closure.

RAB MEMBER: Any idea how much paperwork this thing's accumulated? I

got a stack at home.

MR. BOYLE: I'm a project manager for two other sites and I was a project manager for another site, BRAC site, Davisville.

RAB MEMBER: That high I got a stack at home this thing's generated.

MR. BOYLE: That's the business unfortunately.

MR. EDMOND: To caveat what Ed says, part of our problem, if you want to construe it as a problem because this is a good problem for our general community, Willow Grove's installation restoration sites, according to EPA, the state, PADEP, and also the Agency for Toxic Substances and Disease Registry, which is an arm of the CDC, all feel that we present no health or environmental risk to really anyone. There are hazards here that have to be cleaned up, but the Navy, the Air Force, the Army, and the Marine Corps have hazards that are affecting both ecosystems and humans all over the

country. So with the war in Iraq and the fight against terrorism, money for these type of things isn't as large as it has been in the past. So the people who are at the head of the line, so to speak, with their hands out are the people that have an immediate risk to human health or to ecosystems. Because we're not that bad is a bad thing when you're looking at finishing up, but it's a good thing to where we're not presenting a real immediate and present danger to our community. So it's a double-edged sword. Yes, it's taken a while, it's going to take more time, but the good point is nobody is going to really be harmed by what is in our ground. And that's the good side. Yes, it's got to be cleaned up. Eventually, yes, it could spread outside the Air Station. But if it starts to move, then the money will flow faster. It's kind of a catch-22. If you're not that bad, you don't get that much money. If you're bad, they're going

to throw money at you.

RAB MEMBER: In other words, what we're doing is like a money machine. It's just going around and around and around.

MR. EDMOND: No. We're only spending money when the state or EPA says we're looking at your data to close a site or to move onto the next step and we see a gap here and gap there, fill in these gaps, then come back to us and we'll let you move on to the next step. It seems like it's taken so long because we don't have the money flow. If this was a range where we bombed over the last 40 years and we had unexploded ordnance, it would probably be cleaned up by now because it's a threat to the community, it's a threat to human health, it's a threat to the ecosystem. So the Navy or DOD or Congress would have given us all the money we want and we would have moved at a much faster pace to get it cleaned up. But because we are who we are and

the situation is what it is, we're at the bottom of the food chain, so to speak. Once some of these at the top start getting cleaned up and go away, the money will free up for the majority of us who are at the bottom who don't present a problem.

RAB MEMBER: At that progression, we would be a hundred years cleaning the thing up.

MR. EDMOND: No, no. We figure it's probably going to be a ten-year process, approximately ten years, can't hold me to that because it changes, but ten years before the Base really can say, RAB, thanks for showing up all these years, we're done.

RAB MEMBER: You'll be retired in ten years.

MR. EDMOND: I'll be retired before then. There will be somebody else sitting here in this chair. But the worst case scenarios are up at the front. Your best cases bring up the rear. We're

just happy to be a best case scenario in this realm that we're working with. I mean, if it wasn't for this general area using groundwater for drinking, we would probably not be on the NPL list. Because groundwater is affected by our contamination and we on the Air Station, Horsham, Montgomery, Bucks County, we all drink out of the same aquifer, that gave us the bonus points to put us on the NPL. If it wasn't for that, we wouldn't be here right now. The rest of our sins are really a lot smaller than private business on the outside, but because drinking water was affected, that's one of the ones that kicks it off into the next realm because it does have an impact to human health. So even though we're not impacting the water any worse than what's on that side of the fence or this side of the fence or north or south but because it does impact drinking water, it was that extra bonus points that put us over the top.

RAB MEMBER: It would have been a hell of a lot cheaper to pipe in some water.

MR. EDMOND: You know, the water you drink is no more contaminated than the water you drink on the Air Station. We're all the drinking the same water. It's all basically treated the same way. We follow the same steps as -- I sit on the Horsham Water Authority wellhead protection committee. They have the same problems we do, but their problems are because everybody else had polluted a hundred years ago, 50 years ago. They treat their water the same way we treat our water.

MS. FLIPSE: There's no place with uncontaminated water to pump.

RAB MEMBER: It's going to come from the Delaware River, either that or up the Poconos.

MR. EDMOND: Everybody in this area drinks the same water more or less.

RAB MEMBER: I got a question.

You speculated that some of this is coming from off-site. And I think about the area there on Horsham Road. The only thing apparent would be the Amoco station.

MR. EDMOND: Well, that's not the site we're worried about. It's this side of the Base where there's a site we're worried about off-site.

RAB MEMBER: Privet Road's up here. I'm sorry. Okay. But has anybody from PADEP heard that and gone to see where is this stuff coming from?

MS. FLIPSE: Yes. We've shared the data we have.

RAB MEMBER: What's up there?

MR. EDMOND: It used to be Kellet Aircraft. And we think it could have been coming from them.

MS. FLIPSE: But when USGS pulled the Navy pumps in the wells, the fracture trace seemed to be coming from that direction and at a depth --

RAB MEMBER: And the flow was

that way too.

MS. FLIPSE: Yes.

MR. EDMOND: And our pumps for 50 years have been sucking it from that side to us. It's like we're pulling it to us.

MS. FLIPSE: So that and I was just sitting here thinking, you know, I should have paid more attention -- someone had been up fairly recently and sampled a couple houses over there, but now she's involved in a major disaster that's nearly in Berks County. We were going to tell the other region that they could have the whole thing if they wanted. They're getting phone calls from the people just over the county line. Why aren't we getting bottled water? They have a public meeting tonight. So I'm not sure what she's done and I don't even know what results they got, but I do know they were over on the other side of Horsham Road and sampled within the last couple months.

RAB MEMBER: It gets complicated who's holding back.

MR. TURNER: April, if you get any results and could share them, we'd be more than happy to have a look at those.

MS. FLIPSE: I will try and talk to Sharon tomorrow. No. She's going straight out to sample more houses up there. But I will talk to her again and find out. And since I've been bored, maybe I'll take it from her.

MR. EDMOND: You can come up here. I have some things.

RAB MEMBER: We get it all cleaned up on the Base, it still migrates in.

MR. EDMOND: In a real sense, that's what has happened.

MS. FLIPSE: The same thing sort of happened with the cleanups up at Warminster where we got just so far along and then it appeared that some of the contamination in areas up there was actually coming onto the Base from

outside it. And the Navy was allowed to stop trying to clean the whole county. And we think this is the same thing here. So we're saying, okay, we know there's a bad contamination problem on the other side of the road. We think we know where it's coming from. It's actually in the stream over there or at least it was whenever the last time someone was out there and sampled.

RAB MEMBER: The Coastal station's off the table?

MS. FLIPSE: It's TCE.

MR. TURNER: Not the same compounds.

MS. FLIPSE: So that would allow DEP to say to the Navy Privet Road groundwater is not an issue because Privet Road is not the cause -- I mean, the landfill there or the wash rack, I guess it's the Air Force's wash rack, they're not the issue in those Navy supply wells so, therefore, yes, you can ROD no further action and say that it's

coming from off the Base. There's nothing more that you can do really except continue to provide clean water by stripping it before you put it out in the faucets. But that will then go across the road and see what we can find and if there's anything we can do out there.

RAB MEMBER: That will solve the problem. Give them all that Poland Springs water.

MR. EDMOND: We're going to have Willow Grove spring water. But it's like Montgomery County and Bucks County, just the whole water supply has TCE and PCE in it. I mean, it's from past practices. It's countywide. Every water authority strips their water of PCE and TCE. It's the only way they get certified to have it as drinking water.

RAB MEMBER: Throw it up in the air.

RAB MEMBER: My understanding what Horsham was doing --

MS. FLIPSE: Depending on the

amounts, but really you're not allowed to change water pollution into air pollution.

RAB MEMBER: Air strippers.

MS. FLIPSE: They use air to volatilize the compounds and then the air actually goes into a carbon thing.

MR. EDMOND: Canister.

MS. FLIPSE: Carbon canister so that the compounds adhere to the carbon and you clean the carbon instead of stripping it from the water through carbon filters.

RAB MEMBER: This mess you got up here on Swamp Road --

MS. FLIPSE: Which one is that?

RAB MEMBER: Pools Corner. One outfit is stripping it. They've been stripping it for three years. Right across the street's another company's stuff, they're not stripping it at all. They don't have a stripper there.

MR. EDMOND: I don't know about that.

RAB MEMBER: Let's move on.

MR. BOYLE: Any more questions? Thanks.

MR. EDMOND: I was hoping to have more of the community here because one of the things I wanted to pass out for you guys to look at and if you had any comment, these are letters to RAB members from the Department of Defense from the Office of the Under Secretary of Defense for the environment. It's draft changes in the RAB procedures. I read it. I didn't see what we're doing changes very much at all, if anything, from what they're proposing. But if you want to read it and have any comments, at the bottom of the cover letter, there's an address or E-mail, I think even a voice mail where you can bring your comments about the changes. But one of the things I did see there that we do not have -- I asked Ed to give me a copy from Mechanicsburg -- is a mission statement or a vision statement of the RAB. I'd

like to give these to you guys.

RAB MEMBER: I have to get another bookcase.

MR. EDMOND: Read this one and if you can come up with any ideas for our next RAB meeting on how you'd like to put together a vision or a mission statement or if you even consider having one at all --

RAB MEMBER: Nice barbecue.

MS. FLIPSE: With all the papers.

RAB MEMBER: We must submit our comments on or about date TBD. They haven't figured it out, but it must be submitted before then.

MR. EDMOND: They'll give you plenty of time. They'll take your comments. They're pretty good at that stuff.

That's about it for this evening. One thing I did want to tell you, give you a copy of another piece of paper for you, John, this is a copy of

our environmental policy statement. This is the cornerstone for the environmental programs for the Air Station. This is signed by Captain Smith.

RAB MEMBER: Who was that guy we sent down to the Pentagon?

MR. EDMOND: From here? Several of them. Admiral Keith worked at the Pentagon. He was a commanding officer here.

RAB MEMBER: This guy wasn't a commanding officer. Somebody down in the lower ranks.

MR. EDMOND: Don't know.

MR. TURNER: Former XO?

RAB MEMBER: Nice guy. He says come down and I'll take you around. Then they blew up the dam thing, part of it.

MR. EDMOND: The only other thing I want to share with you guys is if you're interested, here's some pamphlets back here on four of our programs at the Air Station. It's good stuff for you to read if you want to, one on our

environmental management system, one on affirmative procurement, the greening of government, one on stormwater, and one on solid management and recycling, give you an idea of what we try and instill in the troops here, what we're trying to do environmentally.

But besides that, that's all we have for the evening. I was going to propose the next meeting for 9 June but that will be tentative. We won't have another meeting if we don't have anything to give you folks of some substance. Ed and I and the Air Force, our friends over at the Air Force will see what we got. If we have enough information, we'll present another RAB on the 9th. If not, I'll send out a condolence letter, sorry, we're going to put it off to September. That's it. Thank you.

John, George, Ted, thank you for coming.

I'll adjourn the meeting until the next one, hopefully the 9th. If not,

I'll get ahold of everyone.

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REPORTED BY: Kimberly A. Overwise, RPR

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